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November 14, 2005

Mr. James Chang  
U.S. Environmental Protection Agency  
75 Hawthorne Street, SFD-8-3  
San Francisco, California 94105

**Subject: Contract No. 68-W-02-052 /WA No. 052-05-09Q6  
George Air Force Base Work Assignment, Review of the Draft  
Building 513 Chlordane Investigation Report, George Air Force Base,  
October 2005**

Dear James:

Attached are TechLaw's comments for the review of the Draft Building 513 Chlordane Investigation Report, George Air Force Base, October 2005. The recommendation of No Further Action for this site appears reasonable. However, while the risk posed by the presence of chlordane in a localized area is minimal it nevertheless does not allow for unrestricted use unless the regulatory agencies agree. A General Comment is therefore provided suggesting the Air Force request the site be considered for unrestricted use as a risk management decision.

If you have any questions or comments regarding this submission, please contact Bill Mabey at 281-8730 extension 24. We appreciate the opportunity to provide contracting services to the EPA on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Indira G. Balkissoon'.

Indira G. Balkissoon  
Regional Manager

BM:KW:IB:cLar

cc: P. Brown-Derocher/Central Files, TechLaw, Inc.



**GEORGE AIR FORCE BASE  
George Air Force Base, California**

**REVIEW OF THE DRAFT  
BUILDING 513 CHLORDANE INVESTIGATION REPORT  
GEORGE AIR FORCE BASE  
OCTOBER 2005**

**Submitted to:**

**Mr. James Chang  
EPA Work Assignment Manager  
U.S. Environmental Protection Agency  
Region IX SFD-8-3  
75 Hawthorne Street  
San Francisco, California 94105**

**Submitted by:**

**TechLaw Inc.  
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**EPA Work Assignment No.  
Contract No.  
EPA WAM  
Telephone No.  
TechLaw Site Manager  
Telephone No.**

**052-05-09Q6  
68-W-02-052  
James Chang  
(415) 972-3193  
Bill Mabey  
(415) 281-8730 x 24**

**November 14, 2005**

**DRAFT BUILDING 513 CHLORDANE INVESTIGATION REPORT  
OCTOBER 2005**

**GENERAL COMMENT**

1. This Draft Building 513 Chlordane Investigation Report provides the basis for a recommendation of No Further Action at this site, but incorrectly describes the risk posed by the presence of chlordane at this site. For example, Section 3.3, Data Analysis, concludes that "it was determined that the carcinogenic ... risks to human health are below the USEPA risk criteria for Building 513;" Section 4.4, Conclusions and Recommendations, states that "the screening-level risk assessment concluded that potential exposure to soil at Building 513 should not result in adverse health effects for either the hypothetical future resident or the industrial worker." However, contradictory to these general statements, Table 3-2 presents the calculated risk to a future resident exposed to surface soil as  $2.5 \times 10^{-6}$ . While this value is in the risk management range of  $10^{-4}$  to  $10^{-6}$ , please recognize that  $2.5 \times 10^{-6}$  is a risk that does not allow unrestricted use of the site unless risk managers agree that unrestricted use is acceptable (see below.)
2. Review of the chlordane analysis data for the site (Table 3-1) indicates that only two concentrations (24,100 ug/kg and 3,170 ug/kg) of the 27 concentrations are above the residential soil Preliminary Remediation Goal of 1,600 ug/kg. Additionally, the two high soil concentrations appear to be within about 10-feet of each other, and the highest concentration (from the 2003 sampling) was not verified in subsequent sampling effort in 2005 (location B513-SS27, Figure 3-1.) Based on these observations, please consider revising this report to also request the regulatory agencies make a risk management decision of unrestricted use for the site.